



Code of Conduct

1. Object & Applicability

The purpose of this code of conduct is to conduct the business of the company in accordance with the applicable laws, Regulations, Rules and with the highest standard of ethics and values, the matters covered in this code are utmost importance to the company, Shareholders and other Stake holders.

This Code of Conduct is applicable to all company Directors and Employees with a view to:

- Promote and ensure honest and ethical conduct including ethical handling of actual or apparent conflicts of interest between personal and professional relationship.
- Promote and ensure full and fair disclosure in reporting.
- Promote and ensure compliance with all applicable laws and regulations.

2. Honest and Ethical Conduct

All the Directors and Employees shall act in accordance with the highest standard of personal and professional integrity, honest and ethical conduct.

3. Conflict of Interest

All the Directors and Employees must avoid any conflict of interest between themselves and company. A conflict of interest occurs when the personal interest interferes or appears to interfere with the interest of the company as a whole.

A conflict of interest between the company on the one hand and its employee/director on the other hand can arise when:

- a) He takes actions or has interests that may make it difficult to perform his duty objectively.
- b) He or his member of the family received improper personal benefits as a result of his position as a Director/Employee of the company
- c) Any outside business activity that hinders his ability to devote appropriate time and attention to his responsibilities with the company.



- d) The receipt of any gift/entertainment from any person/company with which the company has business dealings.

Authorized for Circulation:

A handwritten signature in black ink, appearing to read 'P. Mutale', is written over a horizontal line. Below the signature, the name 'PAUL M.C. MUTALE' is printed in a small, black, sans-serif font.

CHIEF EXECUTIVE OFFICER